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November 6, 2003

T.R.A. DOCKET ROOM

Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

In Re: Implementation of the Federal Communications Commission's Triennial
Review Order – 9 Month Proceeding - Switching
Docket No. 03-00491

Dear Chairman Tate:

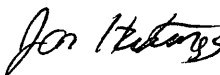
Attached please find the original plus four (4) copies of MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc. and Brooks Fiber Communication of Tennessee, Inc.'s Objections to BellSouth's First Set of Interrogatories (Nos. 1-84) and First Requests for Production of Documents (No.s 1-21) in the above-referenced docket. I have also enclosed a CD-Rom with a PDF version of the objections.

We forwarded an electronic version of the objections to the Tennessee Regulatory Authority. Copies of the objections are being served on all parties of record.

Should you have questions, please give me a call.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Jon E. Hastings

JEH/sja
Attachment

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2003, a copy of the foregoing document was served on the parties of record, via electronically, U.S. mail or hand delivery:

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Jon E. Hastings

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Switching)* Docket No. 03-00491

Implementation of the Federal Communications Commission's Triennial Review Order (Nine-month Proceeding) (Hot Cuts) Docket No. 03-00526

**MCI's OBJECTIONS TO BELL SOUTH'S FIRST SET OF
INTERROGATORIES (Nos. 1-84) AND FIRST REQUESTS FOR
PRODUCTION OF DOCUMENTS (Nos. 1-21)**

MCI metro Access Transmission Services, LLC, MCI WorldCom Communications, Inc. and Brooks Fiber Communications of Tennessee, Inc., (collectively "MCI"), pursuant to the October 21, 2003 *Order on October 21, 2003 Status Conference*, (hereinafter "*Procedural Order*"), hereby objects to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories and First Requests for Production of Documents to MCI, served on October 27, 2003. Any responses made to BellSouth's interrogatories and requests for production of documents will be made subject to these and subsequent-stated objections, the Protective Agreement previously executed between the parties, and any protective order as may be issued by the Tennessee Regulatory Authority ("TRA") in this docket.

General Objections

MCI makes the following General Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents, including the applicable definitions and general instructions therein ("BellSouth discovery"), which, as appropriate, are specifically identified and incorporated into the relevant responses below.

1. MCI has interpreted the BellSouth discovery to apply to MCI's regulated intrastate operations in Tennessee and will limit its responses accordingly. To the extent that any BellSouth discovery is intended to apply to matters that take place outside the state of

Tennessee and which are not related to Tennessee intrastate operations subject to the jurisdiction of the TRA, MCI objects to such request as irrelevant, overly broad, unduly burdensome, and oppressive.

2. MCI objects to the BellSouth discovery to the extent that such discovery calls for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
3. MCI objects to the BellSouth discovery insofar as such discovery is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests.
4. MCI objects to the BellSouth discovery insofar as such discovery is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.
5. MCI objects to the BellSouth discovery insofar as it seeks information or documents, or seek to impose obligations on MCI which exceed the requirements of the Tennessee Rules of Civil Procedure, Tennessee law, the TRA's Rules of Practice and Procedure and other TRA rules, or any other applicable laws, rules, or procedures.
6. MCI objects to providing information to the extent that such information is already in the public record before the TRA or which is already in the possession, custody, or control of BellSouth.
7. MCI objects to the BellSouth discovery to the extent that such discovery is overly broad, unduly burdensome, expensive, oppressive, or excessively time consuming as written.
8. MCI objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Rule 26.03 of the Tennessee

Rules of Civil Procedure. To the extent that BellSouth's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, MCI will make such information available to counsel for BellSouth pursuant to the Protective Agreement previously executed between the parties and any subsequent protective order, as may be issued in this docket, subject to any other general or specific objections contained herein.

9. MCI is a large corporation with employees located in many different locations in Tennessee and in other states. In the course of its business, MCI creates countless documents that are not subject to TRA or FCC retention of records requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. MCI will conduct a reasonable and diligent search of those files that are reasonably expected to contain the requested information. To the extent that BellSouth discovery purports to require more, MCI objects on the grounds that compliance would impose an undue burden or expense.
10. MCI objects to the BellSouth discovery that seeks to obtain "all," "each," or "every" document, item, customer, or other such piece of information to the extent that such discovery is overly broad and unduly burdensome.
11. MCI objects to the BellSouth discovery to the extent such discovery seeks to have MCI create documents not in existence at the time of the request.
12. MCI objects to the BellSouth discovery to the extent that such discovery is not limited to any stated period of time or a stated period of time that is longer than is relevant for

purposes of the issues in this docket, as such discovery is overly broad and unduly burdensome.

13. In light of the short period of time MCI has been afforded to respond to the BellSouth discovery, the development of MCI's positions and potentially responsive information to the BellSouth requests is necessarily ongoing and continuing. This process is further complicated since, at this point in time, the actual issues to be set forth for hearing in this docket have not yet been established by order of the TRA. Except where otherwise stated in response to a specific BellSouth discovery request, MCI does not assume an affirmative obligation to supplement its answers on an ongoing basis, contrary to the BellSouth General Instruction.
14. MCI objects to the definition of "voice-grade equivalent lines," and each and every interrogatory or request for production that includes such term, as this term is not used by MCI in the course of its business, and MCI does not maintain information regarding "voice-grade equivalent lines" in the ordinary course of business. Given MCI's business records, MCI will answer such discovery by providing information regarding MCI's DSOs.
15. MCI objects to each and every interrogatory or request for production that seeks information regarding enterprise customers as such discovery is irrelevant for purposes of this docket and is not reasonably calculated to lead to the discovery of admissible evidence since the scope of this proceeding, as set forth by the FCC and the TRA, is limited to local circuit switching for mass market customers.
16. MCI objects to each and every interrogatory or request for production that seeks information regarding non-switched services (e.g., services that do not depend on Class 5

switches) except for non-switched services (e.g., DSL) provided on loops that are also used to provide switched services, as such discovery is irrelevant for purposes of this docket and is not reasonably calculated to lead to the discovery of admissible evidence since the scope of this proceeding, as set forth by the FCC and the TRA, is limited to local circuit switching for mass market customers.

17. MCI objects to each and every interrogatory or request for production that seeks information regarding MCI's operations in ILEC service areas other than the BellSouth ILEC service area within the state of Tennessee as such information is irrelevant to BellSouth's case in this docket and such discovery is overly broad and unduly burdensome.
18. MCI objects to each and every interrogatory or request for production that seeks to obtain information regarding "former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of MCI" as such information is not within MCI's control, would be unduly burdensome to attempt to obtain and is likely irrelevant.
19. MCI objects to the definitions for "qualifying service" and "non-qualifying service," and each and every interrogatory or request for production that includes such terms, as MCI does not use such terms in the ordinary course of business, does not maintain information regarding "qualifying service" and "non-qualifying service" in the ordinary course of business, and answering in these terms would require MCI to provide a legal interpretation of the FCC's terms. With the exception of the specific services the FCC has designated as qualifying or non-qualifying, the term is not clearly defined by the FCC or by BellSouth. For example, as the FCC stated in footnote 466 of the Triennial Review Order (FCC 03-36, released August 21, 2003) ("TRO"), "Our list is intended to identify

general categories of services that would qualify as eligible services. It is not intended to be an exhaustive list or to identify services in a more particular manner.” Thus, such discovery is overly broad and vague and it would be unduly burdensome for MCI to respond to such ambiguous discovery.

20. MCI objects to the definitions for “hot cut,” “batch hot cut,” and “individual hot cut,” and each and every interrogatory or request for production that includes such terms, as such definitions are vague in that it is not clear whether or to what extent BellSouth’s practices are consistent with the FCC’s use of such terms, however, such terms may be defined by the FCC. Thus, such discovery is overly broad and vague and it would be unduly burdensome for MCI to respond to such ambiguous discovery. MCI further objects to BellSouth’s use of such terms as they apply to BellSouth’s individual hot cut process as MCI is not privy to each and every process or procedure employed by BellSouth in implementing such hot cuts.
21. MCI objects to each and every interrogatory or request for production that seeks information regarding MCI’s projections regarding future services, revenues, marketing, strategies, equipment deployments, or other such future business plans as such requests are trade secrets and, for purposes of this proceeding, would be highly speculative and irrelevant to the issues to be decided in this docket. Moreover, MCI’s future plans are irrelevant because the TRO concerns a hypothetical CLEC.
22. MCI objects to BellSouth’s discovery to the extent it seeks information not within MCI’s possession, control, or custody or to the extent BellSouth’s discovery requests that MCI provide information that MCI does not maintain in the ordinary course of business.

INTERROGATORIES

INTERROGATORY 1. Identify each switch owned by MCI that MCI uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, and 18 as if set forth herein verbatim.

INTERROGATORY 2. For each switch identified in response to Interrogatory No. 1, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

MCI RESPONSE: With respect to Interrogatory 2 (a)-(c), MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim. With respect to Interrogatory 2 (d)-(f), MCI adopts and incorporates its General Objections 8, 14, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 3. Identify any other switch not previously identified in Interrogatory No. 1 that MCI uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by MCI either on an unbundled or resale basis.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, and 19 as if set forth herein verbatim.

INTERROGATORY 4. For each switch identified in response to Interrogatory No. 3, please:

- (a) identify the person that owns the switch;
- (b) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (c) provide the street address, including the city and state in which the switch is located;
- (d) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
- (f) identify all documents referring or relating to the rates, terms, and conditions of MCI's use of the switch; and
- (g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

MCI RESPONSE: MCI adopts and incorporates its General Objection 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 10, 14, 15, 17, 19 and 22 as if set forth herein verbatim.

INTERROGATORY 8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center

area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to

ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- (a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- (b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- (c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- (d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- (e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- (f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- (g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- (h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- (i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- (j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- (k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- (l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- (m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 14, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- (a) Provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) Provide the street address, including the city and state in which the switch is located;
- (c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) Identify all documents referring or relating to the rates, terms, and conditions of MCI's provision of switching capability.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 8, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim. With respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining

in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim. With respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, and 21 as if set forth herein verbatim. With respect to MCI's relevancy objection, MCI further states that the information sought by this interrogatory is not relevant to the impairment analysis since the issue for purposes of this proceeding under the TRO is for potential deployment by a hypothetical CLEC, and thus MCI's specific information is simply not relevant to this analysis.

INTERROGATORY 18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Tennessee? If the answer to this Interrogatory is in the affirmative, please:

- (a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- (b) provide the street address, including the city and state in which the switch is located;
- (c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- (d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- (e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- (f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Tennessee.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 8, 10, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 19. Identify each MSA in Tennessee where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 8, 9, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 22. Identify each MSA in Tennessee where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 3, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 3, 7, 10, 11, 15, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 25. Please state the total number of end users customers in the State of Tennessee to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 26. For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, and 19 as if set forth herein verbatim.

INTERROGATORY 27. For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 28. Please state the total number of end users customers in the State of Tennessee to whom you only provide non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 29. For those end user customers to whom you only provide non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 30. Please state the total number of end users customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 32. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 33. Please provide a breakdown of the total number of end user customers served by MCI in Tennessee by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, and 17, and 22 as if set forth herein verbatim.

INTERROGATORY 36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, 21 and 22 as if set forth herein verbatim.

INTERROGATORY 37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Tennessee.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Tennessee.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 8, 10, 12, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 39. Describe how the marketing organization that is responsible for marketing qualifying service in Tennessee is organized, including the organization's structure, size in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

MCI RESPONSE: MCI adopts and incorporates its General Objections 4, 7, 8, 9, 10, 15, and 22 as if set forth herein verbatim.

INTERROGATORY 40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, and 17 as if set forth herein verbatim.

INTERROGATORY 41. Is there a typical or average number of DS0s at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17, and 21 as if set forth herein verbatim.

INTERROGATORY 42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, and 17 as if set forth herein verbatim.

INTERROGATORY 43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

MCI RESPONSE: MCI adopts and incorporates its General Objections 9, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 46. Provide your definition of sales expense as that term is used in your business.

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, 19, and 22 as if set forth herein verbatim.

INTERROGATORY 50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for MCI in each state in BellSouth's region.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 8, 10, 12, and 20 as if set forth herein verbatim.

INTERROGATORY 51. For each individual hot cut identified in response to Interrogatory No. 50, state:

- i. Whether the hot cut was coordinated or not;
- ii. If coordinated, whether the hot cut occurred as scheduled;
- iii. If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, MCI, the end-user customer, or some third party, and describe with specificity the reason the hot cut did not occur as scheduled;
- iv. If there was a problem with the hot cut, state whether MCI complained in writing to BellSouth or anyone else.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 7, 8, 10, 12, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 52. Does MCI have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 53. Does MCI have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 54. State whether MCI agrees that it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 16, 2001 Memorandum of Understanding. If MCI does not agree, explain why and explain MCI's view of its involvement in the development of that process.

MCI RESPONSE: BellSouth has withdrawn this Interrogatory.

INTERROGATORY 55. If MCI has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 56. If MCI has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in MCI's process that differs from BellSouth's process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 57. Does MCI have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 58. Does MCI have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 59. What is the largest number of individual hot cuts that MCI has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 60. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 61. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 62. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 63. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 64. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 65. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 66. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 67. Does any ILEC outside the BellSouth region have a rate for an individual hot cut process that is acceptable to MCI? If so, name the ILEC and provide the rate and the source of the rate.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 68. Does MCI order coordinated or non-coordinated hot cuts?

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, and 17 and 22 as if set forth herein verbatim.

INTERROGATORY 69. Does MCI use the CFA database?

MCI RESPONSE: MCI adopts and incorporates its General Objections 8, 15, and 22 as if set forth herein verbatim.

INTERROGATORY 70. Identify every issue related to BellSouth's hot cut process raised by MCI at the Tennessee CLEC collaborative since October 2001.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 71. What is the appropriate volume of loops that you contend the Tennessee Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 72. What is the appropriate process that you contend the Tennessee Public Service Commission should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 73. If MCI disagrees with BellSouth's individual hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 74. If MCI disagrees with BellSouth's bulk hot cut process, identify every step that MCI contends is unnecessary and state with specificity why the step is unnecessary.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 75. Identify by date, author and recipient every written complaint MCI has made to BellSouth regarding BellSouth's hot cut process since October 2001.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 6, 7, 8, 9, 17, and 22 as if set forth herein verbatim.

INTERROGATORY 76. How many unbundled loops does MCI contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 77. What is the appropriate information that you contend the Tennessee Public Service Commission should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 78. What is the average completion interval metric for provision of high volumes of loops that you contend the Tennessee Public Service Commission should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 79. What are the rates that you contend the Tennessee Public Service Commission should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 11, 13, 20, and 22 as if set forth herein verbatim.

INTERROGATORY 80. What are the appropriate product market(s) that you contend the Tennessee Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 81. What are the appropriate geographic market(s) that you contend the Tennessee Public Service Commission should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 82. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 83. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

INTERROGATORY 84. What is the maximum number of DS0 loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the Tennessee Public Service Commission should consider in establishing a "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 10, 13, 21, and 22 as if set forth herein verbatim.

REQUESTS FOR PRODUCTION

PRODUCTION REQUEST No. 1. Produce all documents identified in response to BellSouth's First Set of Interrogatories.

MCI RESPONSE: MCI adopts and incorporates its objections contained in any interrogatory to which it may identify and produce responsive documents.

PRODUCTION REQUEST No. 2. Produce every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service in the State of Tennessee.

MCI RESPONSE: MCI adopts and incorporates its General Objections 1, 2, 4, 7, 8, 10, 12, 15, 16, 17, 18, 19, 21, and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 3. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 4. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you only provide qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 5. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you only provide non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 6. Produce all documents referring or relating to the average monthly revenues you receive from end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 7. Produce all documents referring or relating to the average number of access lines you provide to end user customers in Tennessee to whom you provide both qualifying and non-qualifying service.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 7, 8, 10, 12, 15, 16, 17, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 8. Provide all documents referring or relating to the classifications used by MCI to offer service to end user customers Tennessee (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers).

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 9. Produce all documents referring or relating to the average acquisition cost for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 34.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 10. Produce all documents referring or relating to the typical churn for each class or type of end user customer served by MCI, as requested in BellSouth's First Set of Interrogatories, No. 35.

MCI RESPONSE: MCI adopts and incorporates its General Objections 3, 4, 7, 8, 10, 12, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 11. Produce all documents referring or relating to how MCI determines whether to serve an individual customer's location with multiple DS0s or with a DS1 or larger transmission system.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 12. Produce all documents referring or relating to the typical or average number of DS0s at which MCI would choose to serve a particular customer with a DS1 or larger transmission system as opposed to multiple DS0, all other things being equal.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 17 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 13. Produce all documents referring or relating to the cost of capital used by MCI in evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 14. Produce all documents referring or relating to the time period used by MCI in evaluating whether to offering a qualifying service in a particular geographic market (e.g., one year, five years, ten years or some other time horizon over which a project is evaluated)?

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 15. Produce all documents referring or relating to your estimates of sales expense when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 16. Produce all documents referring or relating to your estimates of general and administrative (G&A) expenses when evaluating whether to offer a qualifying service in a particular geographic market.

MCI RESPONSE: MCI adopts and incorporates its General Objections 7, 8, 15, 19 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 17. Produce all documents referring or relating to any complaints by MCI or its end user customers about individual hot cuts performed by BellSouth since January 1, 2000.

MCI RESPONSE: MCI adopts and incorporates its General Objections 6, 7, 8, 10, 12, 20, and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 18. Produce all documents referring or relating to a batch hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 19. Produce all documents referring or relating to an individual hot cut process used by any ILEC in the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 20. Produce all documents referring or relating to a batch hot cut process used by any ILEC outside the BellSouth region that is acceptable to MCI or that MCI believes is superior to BellSouth's batch hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

PRODUCTION REQUEST No. 21. Produce all documents referring or relating to an individual hot cut process used by any ILEC outside the BellSouth region that is

acceptable to MCI or that MCI believes is superior to BellSouth's individual hot cut process.

MCI RESPONSE: MCI adopts and incorporates its General Objections 2, 7, 10, 11, 13, 20 and 22 as if set forth herein verbatim.

Respectfully submitted,

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